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February 17, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**BOARD OF
COMMISSIONERS**

Randall Franke
Gary Heer
Mary Pearmine

**ADMINISTRATIVE
OFFICER**

Ken Roudybush

Federal Communications Commission
1919 M Street, Suite 222
Washington, DC 20554

RE: Comments on Docket 92-235.

This is to express a concern about the potential impact of FCC Docket 92-235 on public safety radio users. It appears that it may have serious and costly effects nationwide on local emergency response systems. This is based on our evaluation of its impact here in Marion County, Oregon.

1. The whole concept seems to be questionable to begin with. Why require major, unnecessary changes to the public safety radio system, which ranks second in priority only to national defense, simply to create additional commercial radio channels?
2. The time table for implementation by January 1, 1996 is totally unrealistic when considering the fact that it will require major changes to most public safety radio systems.

Coverage will be reduced due to new limits on power which will require additional equipment; however, additional equipment will have to meet new requirements for bandwidth which will mean replacing all existing equipment because existing equipment is not compatible with the proposed bandwidth requirements.

3. Marion County is a moderate-size county with 1,194 square miles, but it will not be possible to obtain the necessary coverage for our radio systems with reduced power.

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Letter to Federal Communications Commission
From Marion County Board of Commissioners
RE: Comments on Docket 92-235
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4. Marion County, with a population of 250,000 to serve and with severe local budget constraints, cannot realistically afford to purchase a new radio system by January 1, 1996.

It would cost over \$275,000 for our Public Works and Sheriff's Office systems. just in replacement